

I. HEADING

DATE: January 23, 1996

FROM: [REDACTED] OSC, Region V EERB, Grosse Ile, MI (ERU/REGV)  
Joe Fredie, OSC, Region V EERB, Westlake OH

TO: E. Watkins, UESPA, OSWER, Wash.DC.....(VIA LAN)  
R. Karl, Chief, EERB, Chicago, IL.....(VIA LAN)  
J. El-Zein, EERB, Act. Chief, RS-1, Grosse Ile, MI..(VIA LAN)  
A. Lily, ESS, Chicago, IL.....(VIA LAN)  
C. Liszewski, USEPA ORC, Chicago, IL.....(VIA LAN)  
E. Speizman, USEPA Ofc. Pub. Aff., Chicago, IL....(VIA LAN)  
K. Clouse, Ohio EPA, DERR, CDO, Columbus, OH..(614-644-3250)  
D. O'Neill, Ohio EPA, DERR, Twinsburg, OH.....(216-487-0769)  
L. Thompson, Chief, Fire Dept., Painesville, OH..(216-352-8169)  
J. Martin, Chief, Painesville City Fire Dept., (216-352-2609)  
J. Davin, U.S. Coast Guard, Cleveland, Ohio... (216-522-3290)

SUBJECT: [REDACTED] Removal Action, Painesville Twp.,  
Lake County, Ohio.

II. BACKGROUND:

Site NO:	A506
Response Authority:	CERCLA
CERCLA Incident Category:	Removal Funded
NPL Status:	None
Start Date:	11/28/95
Complete Data:	12/18/95

III. RESPONSE INFORMATION:

A. Situation

1. The Lake Underground Storage site consists of two separate locations approximately 2 miles apart at 675 Lakeshore Blvd. and 1504 W. Jackson Street in Painesville Twp., Lake County, Ohio. The Lakeshore Blvd. site is approximately 70 acres with three unsecured corroded aboveground storage tanks of ethyl mercaptan: a 500 gallon tank in the rafters of a truck loading facility, a 1500 gallon tank on the ground suspected to be connected to the tank in the rafters, and a 500 gallon tank in the weeds near the 1500 gallon tank. The Jackson Street site is approximately 100 acres with one 500 gallon tank of ethyl mercaptan.
2. On November 15, 1995, Ohio EPA initiated a site investigation and characterized the content of the tanks after complaints from Painesville residents of odor from the site and a request for assistance from the local Fire Departments. A liquid stream was leaking from a valve at the top of the 1500 gallon tank, which was

tightened to stop the leak. A liquid sample of the material indicated a flashpoint of 670 F and that it was ethyl mercaptan. These wastes posed threats to human health and the environment through fire and explosion, direct contact and inhalation as routes of exposure.

3. On November 17, 1995, the Ohio EPA requested assistance from the U.S. EPA Superfund Removal program and a site visit was conducted.
4. The U.S. EPA conducted a site assessment at the IUS site on November 21, 1995. Abandoned tanks and drums of ethyl mercaptan and waste oil were documented at the site. These materials were observed to be in close proximity to each other and nearby residential houses approx. 300 Yds. away. In addition, the facility has a 173,250 square foot rubber lined containment pond which contains rain water, oils and tar like sludge and four other aboveground storage tanks which contain 27,250 gallons of waste oils. PCB transformers and drums containing PCB oil were also documented on the site.
5. November 20, 1995 - Verbal authorization was granted to mitigate threats posed by the presence of abandoned tanks and drums found on-site.

#### B. Actions Taken

1. November 24, 1995 - A valve at the bottom of the 1500 gallon tank started dripping liquid mercaptan. Odor complaints were filed from 2 miles away. The Fire Department wrapped the leak with latex gloves and duct tape to temporarily stop the leak.
2. November 30, 1995 - U.S. EPA ERT completes screening the ethyl mercaptan tanks to determine liquid volume of the tanks by using Infrared Temp. meter. It is estimated that the tanks contain a total of between 1300 and 1600 gallon of mercaptan.
3. December 6, 1995 - U.S. EPA, TAT and ERCS on site to initiate removal action. Hot zone and decontamination areas established, safety plan drafted. Secured leaking valves of the ethyl mercaptan tanks and started the construction of a wood-framed enclosure around the 1500 gallon tank to treat vapors through treatment system during emptying of the tank contents.
4. On December 11, 1995 - continued working on site set-up, mobilization of equipment on site and installation of vapor treatment system.
5. On December 12, 1995 - completed construction of the enclosure system around the 1500 gallon tank by building a wood-frame around the tank covered with visqueen to contain the vapors from the tank. The treatment system was set up to treat vapors from the enclosure system with hydrogen peroxide and carbon before releasing into atmosphere.

6. On December 12, 1995 - a security guard arranged to monitor the site during non-working hours.
7. On December 12, 1995 - a 500 gallon ethyl mercaptan tank in the weeds near the 1500 gallon tank at Lakeshore Blvd. site was inspected and found to be empty.
8. On December 12, 1995 - completed Transportation and Disposal coordination for site waste.
9. On December 13, 1995 - ERCS crew opened the 1500 gallon tank to measure its contents and found it to be under pressure. It took several hours to vent the tank. The vapor treatment system was tested and worked as designed. Air monitoring indicated 100 ppm ethyl mercaptan inside the enclosure system, 10 ppm after the hydrogen peroxide treatment and 0 ppm at the outlet.
10. On December 13, 1995 - the 500 gallon tank at Jackson Street was opened and found to be 90% full and not under pressure. It was determined that an enclosure system was not needed since it could be drained from a single valve at the bottom of the tank.
11. TAT continues to conduct random air monitoring in hot zone and along site perimeter during site operations.
12. On December 15, 1995 - ERCS crew started pumping the 500 gallon tank on Jackson Street site at 9 am and finished at 10:30 am. The crew started pumping the tanks at Lakeshore Blvd. starting with the 500 gallon tank in the rafters, the ethyl mercaptan pipe lines in the truck loading area, and the 1500 gallon tank. The truck left site at 2:00 pm. Air monitoring was continuously conducted and respirators were worn when concentrations exceeded 5 ppm near tanker truck exhaust and SCBA was worn inside the enclosure system. Approx. 2000 gallons of ethyl mercaptan liquid were transported by Chemical Waste Management to their Sauget, Illinois facility for incineration.
13. On December 15, 1995 - all heavy equipment and vapor treatment unit were decontaminated and demobilized from the site.
14. On December 18, 1995 - completed demolishing of enclosure system. The ERCS crew demobilized from the site.

#### C. Next Steps

1. Empty ethyl mercaptan tanks remain on-site for later disposal.
2. 20 55-gallon drums which contain liquids and 2 55-gallon drums of spent PPE/disposable supplies were left staged on site for Phase II removal.

#### D. Key Issues

1. None

#### IV. COST INFORMATION

Estimated Costs through January 11, 1995

	BUDGETED	TOTAL TO DATE	REMAINING
HERCS	\$ 50,000	\$ 49,931	\$ 69
TAT	\$ 20,000	\$ 9,560	\$ 10,440
EPA DIRECT	\$ 2,820	\$ 2,820	
EPA INDIRECT	\$ 6,119	\$ 6,119	
Grand Total	\$ 78,939	\$ 68,430	\$ 10,509

The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data, which the OSC must rely upon, may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.